

## Louisiana's Coordinated System of Care Severely Emotional Disturbed Children's Waiver

### Section 1: Settings Assessment

Action Item	Description	Proposed Start Date	Proposed End Date	STATUS
Review of Rules and Policies	OBH will assess all CSoC HCBS and related licensing rules/regulations and policies/procedures to determine degree of compliance with HCBS setting rule.	8/1/14	10/31/14	COMPLETED – Results are included in the “HCBS Settings Analysis” document at the following link <a href="http://www.new.dhh.louisiana.gov/index.cfm/page/1973">www.new.dhh.louisiana.gov/index.cfm/page/1973</a>
Participant Experience Survey	OBH will obtain feedback from participants through a survey to ensure participants’ experience is consistent with the HCBS setting requirements.	1/1/14	4/30/15	
Provider Self-Assessment	OBH will develop an assessment tool that familiarizes providers with the new HCBS rule and allows an opportunity to measure compliance with the new requirements. The assessment tool will identify the areas of the new rule for which the provider is not compliant, thereby allowing providers to target compliance efforts.	1/1/14	4/30/15	
Onsite Visits	Based on the results of the Participant Experience Survey and Provider Self-Assessment, OBH will conduct onsite visits to a sample of settings, including residential and	5/1/15	6/30/15	

	non-residential settings, to ensure they have HCBS characteristics.			
Analysis	OBH will compile and analyze the results of the settings analysis and present findings to stakeholders and CMS.	6/1/15	8/30/15	

## Section 2: Remediation

Action Item	Description	Proposed Start Date	Proposed End Date	STATUS
Louisiana Administrative Code	OBH will revise rules as necessary to reflect federal regulations on HCBS settings.	11/1/14	3/1/15	
Service Definition Manual	OBH will revise the service definition manual, including policies and procedures, as necessary to incorporate regulatory requirements for HCBS and qualities of an HCBS setting.	11/1/14	12/1/14	
Enrollment	<p>The provider enrollment process will be revised to collect information on the proposed service setting to ensure it comports with the HCBS setting rule.</p> <p>Training will be provided to the Statewide Management Organization's enrollment staff to</p>	1/1/15	2/28/15	

	heighten scrutiny of new providers/settings.			
Information Sharing	OBH will draft and distribute letters to providers describing the proposed transition, criteria for appropriate HCBS settings, deadlines for compliance, and technical assistance availability.	2/1/15	2/28/15	
Quality Framework Strategies	OBH or its designee will survey participants at least annually to monitor their experience with HCBS to ensure it aligns with federal requirements and expectations. In addition, OBH or its designee will monitor providers through the certification and review assessments to ensure continued compliance.	3/1/15	ongoing	
Provider Assessment Findings	<p>OBH will require providers to submit a corrective action plan for areas that require remediation, if the setting is not presumed to be an institution.</p> <p>If settings are identified which are presumed to be institutions, OBH will conduct onsite visits to a sample of settings to determine if they have the HCBS characteristics. If OBH determines the settings have HCBS characteristics, OBH will</p>	9/1/15	8/30/16	

	provide such evidence to CMS, who will make the final decision as to whether the setting is HCBS.			
Heightened Scrutiny Review	Locations presumed to be non-HCBS which are found to have the qualities of HCBS will be submitted to CMS for heightened scrutiny review.	9/1/15	9/30/15	
Participant Transition to Compliant Settings	OBH will develop a process for assisting participants to transition to a new setting as appropriate. Participants will be given timely notice and due process, and will have choice of alternative settings through a person-centered planning process. Transition of participants will be comprehensively tracked to ensure successful placement and continuity of services.	6/1/15	12/31/15	

### Section 3: Public Comment

Action Item	Description	Proposed Start Date	Proposed End Date	STATUS
Announcement of Public Notice	OBH will include a white paper and transition plan on a designated website. Providers and stakeholders will be notified of the opportunity to provide public	10/15/14	10/31/14	COMPLETED – Providers and stakeholders were notified that information was included on our website on 9/30/14.

	comment by direct email. OBH will also publish a public notice in all the major newspapers in the State.			The public notice appeared in all major newspapers on 10/10/14.
Public Comment Period and Forum	OBH will host/participate in public forums to obtain feedback from stakeholders.	10/1/14	11/10/14	IN PROGRESS – OBH presented information about the new HCBS setting rule at the following stakeholder meetings: <ul style="list-style-type: none"> <li>- Statewide Coordinating Council meeting held 9/29/14</li> <li>- CSoC Governance Board meeting held on 10/22/14</li> <li>- Affinity Call with CSoC Wraparound Facilitators held on 10/23/14</li> <li>- Louisiana Behavioral Health Advisory Committee held on 11/3/14</li> </ul>
Distribution of Informational Material	OBH will provide informational materials to CSoC members and their families about the HCBS setting rule.	10/24/14	12/15/14	IN PROGRESS
Integration of Public Comments into Transition Plan Revision	OBH will post each approved iteration of the transition plan to the designated website.	11/1/14	ongoing	
Ongoing Stakeholder Engagement	OBH will continue to share information and updates related to implementation of the transition plan and HCBS rule during future stakeholder meetings. Information related to progress and proposed	11/11/14	ongoing	The next meeting is scheduled for November 17, 2014 from 1PM to 3PM at the Department of Health and Hospitals in room 118. The address is 628 N. Fourth Street, Baton Rouge. The meeting will also be live streamed at <a href="http://www.dhh.la.gov/OCDDLIVE">www.dhh.la.gov/OCDDLIVE</a> .

	actions will be shared to obtain feedback and comments/			
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Change Log (inclusive of major changes)

	REVISION DESCRIPTION	DATE OF REVISION
Section 1, Settings Analysis	<ul style="list-style-type: none"> <li>- Changed proposed start and end dates the Participant Experience Survey and Provider Assessment activities</li> <li>- Provided more details about the the Participant Experience Survey and Provider Self-Assessment activities</li> <li>- Added that OBH will conduct onsite visits to a sample of settings</li> <li>- Changed the proposed start and end dates for the Analysis activity</li> <li>- Updated the status of the Review of Rules and Policies activity</li> </ul>	11/3/14
Section 2, Remediation	<ul style="list-style-type: none"> <li>- Changed the proposed start and end dates for the Louisiana Administrative Code, Service Definition Manual, Enrollment, Provider Assessment Findings, and Participant Transition to Compliant Settings activities</li> <li>- Clarified that informational letters will be sent to providers and modified the proposed start and end date of this activity</li> <li>- Clarified the description of the Provider Assessment Findings activity</li> <li>- Added more details concerning the Quality Framework Strategies activity</li> </ul>	
Section 3, Public Comment	<ul style="list-style-type: none"> <li>- Updated the status of the Announcement of Public Notice, Public Comment Period and Forum, and Distribution of Informational Material activities</li> </ul>	

	<ul style="list-style-type: none"> <li>- Changed the proposed begin and end date of the Public Comment Period and Forum activity</li> <li>- Changed the action item name from Public Comment Retention to Integration of Public Comments into Transition Plan</li> <li>- Added action item Ongoing Stakeholder Engagement and updated status</li> </ul>	
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